

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)	
)	CC Docket No. 94-102
Revision of the Commission's Rules)	
to Ensure Compatibility with)	RM-8143
Enhanced 911 Emergency)	
Calling Systems)	

To: The Commission

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REPLY COMMENTS OF COMCAST CELLULAR COMMUNICATIONS, INC.

Comcast Cellular Communications, Inc. ("Comcast Cellular"), by its attorneys, hereby submits its reply comments in response to the Commission's Public Notice in the above-referenced proceeding.^{1/}

While Comcast Cellular applauds the desire of the Commission to promote enhanced wireless 911 services, Comcast Cellular must oppose adoption of the fatally flawed model described in the "Consensus Agreement." Rather, the Commission should adopt a model that more closely follows the dictates of the marketplace. This will result in better, cheaper advanced 911 services that are tailored to local needs.

Comcast Cellular has a significant interest in this proceeding, both as a major provider of cellular service and as a company which has devoted time and resources to the review of various advanced 911 technologies. Comcast also has been a participant in the

^{1/} Public Notice, "Commission Seeks Additional Comment in Wireless Enhanced 911 Rulemaking Proceeding Concerning 'Consensus Agreement' Between Wireless Industry Representatives and Public Safety Groups," DA 96-198, rel. Feb. 16, 1996 (the "Public Notice"). The Public Notice requested additional comments in the Commission's pending wireless 911 rulemaking. See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Notice of Proposed Rulemaking*, CC Docket No. 94-102, rel. October 19, 1994.

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Associated Group trial of the automatic location identification ("ALI") technology in the Philadelphia market. Comcast was not, however, a participant in the negotiations that led to the "Consensus Agreement" on which the Commission sought comment in the Notice.^{2/}

Comcast Cellular believes that the prompt, efficient implementation of advanced 911 technologies that meet local needs is in the public interest. Contrary to the representations of some parties (notably KSI, Inc.), current ALI technology is not sufficiently advanced for rapid deployment. For example, while the Associated Group's trial in the Philadelphia market shows great promise, to date only a limited alpha trial has been conducted there. It is simply not clear how much more development will be necessary before ALI can be deployed on a widespread basis. Moreover, even assuming that ALI can be developed to the point of commercial deployment for standard AMPS cellular in relatively dense markets in the next few years, that is not enough to support a mandate from the Commission in this proceeding. The comments in this proceeding show that current ALI technologies are not suited for many rural markets. Comments of Ad Hoc Rural Cellular Coalition at 3-4. At the same time, ALI technologies that work for AMPS still will have to be modified, possibly in fundamental ways, to work with digital technologies such as CDMA, TDMA and GSM as those technologies are deployed in wireless networks across the country.

Despite these realities, one prospective vender of ALI technology, KSI, argues that the Commission should adopt a hardline, inflexible position and mandate implementation of advanced 911 technologies by a strict deadline.^{3/} The reason for KSI's position is obvious:

^{2/} Based upon the comments filed in response to the Public Notice, it appears that many carrier perspectives were omitted from those negotiations.

^{3/} KSI Comments at 3. KSI also insists that the mandate should include dynamic
(continued...)

It is a vendor of ALI equipment and, as reported recently in *Wireless Week*, the price for ALI technology is expected to be \$50,000 a cell site.^{4/} A wireless carrier with 500 cell sites, such as a large cellular carrier, would have to spend \$25 million to implement KSI's technology. A PCS provider, with many more cell sites in its coverage area than a cellular carrier, could spend more money implementing ALI than it spent to obtain its license in the Commission's auctions.^{5/}

A Commission mandate for implementation of this technology by a specific deadline regardless of cost will benefit only the few equipment vendors, such as KSI, that may be able to offer minimally compliant ALI technology before the deadline. A deadline will eliminate any incentive for these vendors to provide low cost, efficient technologies that will benefit the public interest. Instead, all leverage will have been given to those vendors and they will be able to extract monopoly rents for their technologies from both wireless carriers and municipalities that pay for 911 implementation. Moreover, vendors like KSI would have no incentive to improve their technology because they would obtain no benefit from doing so.

^{3/} (...continued)

updating of location information, a technology that has marginal utility at best. *Id.* at 4-5. In almost every case, the initial location of a wireless 911 call will be the location that matters. Typically cellular 911 calls come from stationary callers or from moving callers reporting the location of an incident along the side of a road, in which case dynamic updating will provide information that becomes less accurate with each update.

^{4/} See Renée Saunder, "E-911 Pact Heads to FCC," *Wireless Week*, Feb. 26, 1996 at 1.

^{5/} These financial realities also demonstrate that the suggestion of one commenter that wireless carriers should be required to offset their costs of implementing 911 capabilities with revenues they obtain from commercial uses of those capabilities is ridiculous. See Comments of Ad Hoc Alliance for Public Access to 911 at 19. There is no potential commercial use of location technologies that would come remotely close to recovering a cost of \$50,000 per cell site.

A better solution is for the Commission to adopt rules that are more consonant with the normal workings of a competitive marketplace. If vendors have an incentive to develop efficient, cost-effective and feature-rich advanced 911 solutions, they will do so. The Commission can create that incentive by adopting one or both of two approaches: either (1) permit local authorities to require implementation of advanced 911 technologies (in both Phase I and Phase II) only if they reimburse wireless providers for their reasonable costs (including a profit) of doing so; or (2) permit wireless carriers to implement advanced 911 technologies only when they determine that it is economically reasonable to do so (which, among other things, will be affected by the implementation of any such technologies by its competitors). These approaches provide appropriate incentives for implementation of advanced 911 capabilities when it makes sense to do so.

First, if carriers have the choice of when or whether to implement advanced 911 features, they will not purchase those capabilities until it is economically reasonable to do so. This means that the timing of implementation will be based on the needs of the competitive marketplace.^{6/} Because the timing of implementation would depend on both the price and functionality offered by a vendor of ALI capabilities, there would be strong marketplace incentives for vendors to develop inexpensive, efficient and feature-rich technology that is attractive to wireless carriers. This approach is further advanced by maintaining the ability of carriers to charge subscribers for 911 capabilities.

^{6/} Indeed, there is likely to be a competitive advantage to offering advanced 911 services in some cases. A carrier could advertise the availability of advanced 911 as an advantage over another carrier's service, for instance, or might be able to recoup the costs of sufficiently inexpensive ALI technology by offering vehicle monitoring services.

Similarly, if carriers' obligations are dependent on the willingness of local officials to bear the costs (including reasonable profits) of providing advanced 911 capabilities, marketplace incentives also will come into play. Local officials will have to choose how to spend their scarce public safety resources, and will choose to implement advanced 911 capabilities only if that is a good use of those resources. Local public safety officials also will have incentives to work with wireless carriers to determine the most efficient advanced 911 technologies and to find technologies that have dual uses, so that the carrier will be willing to bear some of the costs. It also must be emphasized that, for marketplace incentives to work, wireless carriers must be entitled to a reasonable profit on their 911 costs, in the same way that landline carriers now profit from 911 services. Otherwise, local officials may choose to implement 911 technologies that are more expensive or less efficient than would be chosen in a truly competitive marketplace. In addition, carriers must be entitled to reimbursement for all 911 implementation costs, including those for services identified in the Consensus Agreement as Phase I services.

This latter model for implementation of advanced 911 capabilities is similar in principle to the universal service model contemplated by the Telecommunications Act of 1996. Under that model, carriers are entitled to be compensated for providing services that the state deems essential. *See* 47 U.S.C. § 254. The critical difference is that this model is more responsive to marketplace needs because there is no automatic requirement that advanced 911 capabilities be deployed. Instead, they will be deployed only when it makes economic sense for local public safety officials. Not only will this approach reduce the likelihood of uneconomic deployments, it also will avoid deploying advanced wireless 911

services before local public safety officials have the ability to take advantage of those features.^{7/}

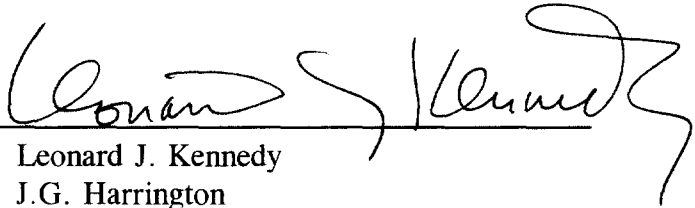
Thus, the Commission should not adopt rules mandating implementation of 911 capabilities on a strict, inflexible schedule. Current technology has not advanced sufficiently to justify such a mandate, and mandatory implementation on a fixed schedule will not encourage development of effective and reasonably-priced solutions. Rather, the Commission should adopt a model that takes advantage of market forces and encourages deployment of 911 features when doing so will be cost-effective and beneficial to all parties — wireless carriers, consumers and public safety agencies — alike.

^{7/} As the comments of rural cellular carriers describe, this is a real concern. There are many areas of the country where basic 911 is not yet deployed. Ad Hoc Rural Cellular Coalition Comments at 5. It would be pointless to require wireless carriers to deploy advanced 911 capabilities in these areas at this time.

For all of these reasons, Comcast Cellular Communications, Inc., urges the Commission to adopt rules consistent these reply comments in this matter.

Respectfully submitted,

COMCAST CELLULAR COMMUNICATIONS, INC.

By: 
Leonard J. Kennedy
J.G. Harrington

Its Attorneys

DOW, LOHNES & ALBERTSON,
A Professional Limited Liability Company
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20037
(202) 776-2000

March 11, 1996

CERTIFICATE OF SERVICE

I, Tammi A. Foxwell, a secretary at the law firm of Dow, Lohnes & Albertson, do hereby certify that on this 11th day of March, 1996, I caused copies of the foregoing "Reply Comments" to be served, by first-class mail except where indicated as hand delivery, to the following:

*The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554
(STOP CODE 0101)

*The Honorable Andrew C. Barrett
Commissioner
Federal Communications Commission
1919 M Street, NW, Room 826
Washington, DC 20554
(STOP CODE 0103)

*The Honorable Rachelle B. Chong
Commissioner
Federal Communications Commission
1919 M Street, NW, Room 844
Washington, DC 20554
(STOP CODE 0105)

*Ms. Michelle Farquhar
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 5002
Washington, DC 20554
(STOP CODE 2000)

*Won Kim
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 5202
Washington, DC 20554

*The Honorable James H. Quello
Commissioner
Federal Communications Commission
1919 M Street, NW, Room 802
Washington, DC 20554
(STOP CODE 0106)

*The Honorable Susan Ness
Commissioner
Federal Communications Commission
1919 M Street, NW, Room 832
Washington, DC 20554
(STOP CODE 0104)

*Mr. John Cimko
Chief, Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 5202
Washington, DC 20554
(STOP CODE 2000E)

*Ms. Regina Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW, Room 500
Washington, DC 20554
(STOP CODE 1600)

The Ad Hoc Telecommunications Users
Committee, The California Bankers Clearing
House and The New York Clearing House
Association
c/o James S. Blaszk/Ellen G. Block
Levine, Blaszk, Block & Boothby
1300 Connecticut Avenue, NW, Suite 500
Washington, DC 20036

Adcomm Engineering Company
c/o Joseph P. Blaschka, Jr., PE
14631 128th Avenue, NE
Woodinville, WA 98027

AllTell Mobile Communications, Inc.
c/o Glenn S. Rabin
655 15th Street, NW, Suite 220
Washington, DC 20005

American Personal Communications
c/o Kurt A. Wimmer
Covington & Burling
1201 Pennsylvania Avenue, NW
PO Box 7566
Washington, DC 20044

AMSC Subsidiary Corporation
c/o Lon C. Levin
10802 Park Ridge Boulevard
Reston, VA 22091

Association of College & University
Telecommunications Administrators
c/o Randal R. Collett
152 West Zandale Drive, Suite 200
Lexington, KY 40503-2486

National Emergency Number Association
c/o James R. Hobson
Donelan, Cleary, Wood & Maser, PC
1100 New York Avenue, NW, #750
Washington, DC 20005

Alamo Area Council of Governments
c/o Al J. Notzon III
118 Broadway, Suite 400
San Antonio, TX 78205

American Mobile Telecommunications
Association, Inc.
c/o Elizabeth R. Sachs
1150 18th Street, NW, Suite 250
Washington, DC 20036

Ameritech
c/o Frank Michael Panek
Room 4H84
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

Associated Group, Inc.
c/o William F. Adler/Steven N. Teplitz
Fleischman and Walsh
1400 16th Street, NW
Washington, DC 20036

Association of Public-Safety Communications
Officials-International, Inc.
c/o Robert M. Gurs
Wilkes, Artis, Hedrick & Lane
1666 K Street, NW, #1100
Washington, DC 20006

Adcomm Engineering Company
c/o Joe Blaschka
14631 128th Avenue, NE
Woodinville, WA 98072

Bell Atlantic
c/o Betsy L. Anderson
1320 N. Courthouse Road, 8th Floor
Arlington, VA 22206

C.J. Driscoll & Associates
2066 Dorado Drive
Rancho Palos Verdes, CA 90275

County of Los Angeles
c/o Thomas H. Bugbee
Telecommunications Branch
Information Technology Services
PO Box 2231
Downey, CA 90242

Constellation Communications, Inc.
c/o Robert A. Mazer/Albert Shuldiner
Vinson & Elkins LLP
1455 Pennsylvania Ave., NW, Suite 700
Washington, DC 20004-1008

National Association of State Emergency
Medical Services Directors
c/o Mark S. Johnson
EMS Communications Committee
1947 Camino Vida Roble, Suite 202
Carlsbad, CA 92008

Cellular Telecommunications Industry
Association (CTIA)
c/o Michael F. Altschul
1250 Connecticut Ave., NW, Suite 200
Washington, DC 20036

BellSouth Corporation, BellSouth
Telecommunications, Inc., BellSouth
Enterprises, Inc. and BellSouth Cellular Corp.
c/o Jim O. Llewellyn
115 Peachtree Street, NE
Atlanta, GA 30309-3610

Cable Plus
c/o Gary O'Malley
11400 SE 6th Street, Suite 120
Bellevue, WA 98004

Department of Corrections
c/o G. Kevin Carruth
Planning and Construction Division
PO Box 942883
Sacramento, CA 94283-0001

People of the State of California and The
Public Utilities Commission of the State
c/o Ellen S. Levine
505 Van Ness Avenue
San Francisco, CA 94102

Cellular Networking Perspectives Ltd.
c/o David Crowe
636 Toronto Crescent, NW
Calgary, Alberta T2N 3W1
Canada

CMT Partners
c/o Adam A. Andersen
651 Gateway Boulevard, 15th Floor
South San Francisco, CA 94080

Comsat Corporation
c/o Alicia A. McGlinchey
22300 Comsat Drive
Clarksburg, MD 20871

Department of Defense
c/o Paul R. Schwedler/Carl W. Smith
Telecommunications, DoD
Defense Information Systems Agency
Code DOI
701 S. Courthouse Road
Arlington, VA 22204

Elert & Associates
c/o Ed Hazelwood
140 Third Street South
Stillwater, MN 55082

ESPN and ESPN2
c/o Edwin M. Durso
605 Third Avenue
New York, NY 10158-0180

Hillsborough County Office of the County
Administrator
c/o B.J. Smith
PO Box 1110
Tampa, FL 33601

National Emergency Number Association
(NENA)
c/o John Schroeder
8744 Government Drive
New Port Richey, FL 34654

A.P.C.O. — Georgia Chapter
c/o James M. Dye
140 N. Marietta Parkway
Marietta, GA 30060

Consumers First and the Ad Hoc Alliance for
Public Access to 911
c/o Jim Conran
PO Box 2346
Orinda, CA 94563

E.F. Johnson Company
c/o Susan H.R. Jones
Gardner, Carton & Douglas
1301 K Street, NW, Suite 900, East Tower
Washington, DC 20005

Ericsson Corporation
c/o David C. Jatlow
Suite 600, 2300 N Street, NW
Washington, DC 20037

Federal Highway Administration
US Department of Transportation
c/o Christine Johnson
400 7th Street, SW
Washington, DC 20590

Lake County Information Services
E9-1-1 Telecommunications
c/o Bruce E. Thorburn
PO Box 7800
Taveres, FL 32778-7800

GE Capital-Rescom
c/o Danny E. Adams/Ann M. Plaza
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

City of Marietta Emergency Communications
c/o Robert L. Williams, Jr.
112 Haynes Street, Suite 911
Marietta, GA 30060

National Emergency Number Association —
Georgia Chapter
c/o James M. Dye
140 N. Marietta Parkway
Marietta, GA 30060

GTE
c/o Andre J. Lachance/David J. Gudino
1850 M Street, NW, Suite 1200
Washington, DC 20036

Hong, Scott
667 Arbor Lane
Warminster, PA 18974

Illinois Telephone Association
c/o John F. Tharp
PO Box 730
Springfield, IL 62705

Interagency Committee on Search and Rescue
(ICSAR)
c/o Chairman Pennington
United States Coast Guard
2100 2nd Street, SW
Washington, DC 20593-0001

KSI Inc.
c/o Charles J. Hinkle, Jr.
7630 Little River Turnpike, Suite 212
Annandale, VA 22003

Caddo Parish Communications
District Number One
c/o Martha Carter
1144 Texas Avenue
Shreveport, LA 71101

GeoTek Communications, Inc.
c/o Susan H.R. Jones
Gardner, Carton & Douglas
1301 K Street, NW, Suite 900, East Tower
Washington, DC 20005

Harris Corporation
c/o R. Daniel Foley
PO Box 1188
Novato, CA 94948-1188

IDB Mobile Communications, Inc.
c/o Robert S. Koppel/Richard S. Whitt
15245 Shady Grove Road, Suite 460
Rockville, MD 20850

International Communications Association
c/o Brian R. Moir
Moir & Hardman
2000 L Street, NW, Suite 512
Washington, DC 20036-4907

Kentucky Emergency Number Association
(KENA)
c/o Jack Y. Sharp
1240 Airport Road
Frankfort, KY 40601

Liberty Cellular
c/o David L. Nace/Marci E. Greenstein
Lukas, McGowan, Nace & Gutierrez
1111 19th Street, NW, 12th Floor
Washington, DC 20036

Department of Public Safety and Correctional
Services Emergency Number Systems Board
c/o Theodore I. Weintaub
Suite 209, Plaza Office Center
6776 Reisterstown Road
Baltimore, MD 21215-2341

Offices of the Attorney General
c/o Stephen H. Sachs/
Emory A. Plitt, Jr./C.J. Messerschmidt
Munsey Building
Calvert and Fayette Streets
Baltimore, MD 21202-1918

Jackson County Emergency Communications
District Mississippi Chapter of NENA
c/o Patricia M. Balduf
600 Convent Avenue
Pascagoula, MS 39567

National Association of Regulatory Utility
Commissioners
c/o Paul Rodgers
PO Box 684
Washington, DC 20044

Department of Law and Public Safety
State Office of the Attorney General
c/o George N. Rover
Hughes Justice Complex
CN 080
Trenton, NJ 08625-0080

North American Telecommunications
Association
c/o Albert H. Kramer/Robert F. Aldrich
Keck, Mahin & Cate
1201 New York Avenue, NW
Penthouse Suite
Washington, DC 20005-3919

Emergency Services Advisory Committee
c/o Lyle V. Gallagher
PO Box 5511
Bismarck, ND 58502-5511

MCI Telecommunications Corp.
c/o Larry A. Blosser/Donald J. Elardo
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Motorola, Inc.
c/o Michael D. Kennedy/Michael A. Menius
1350 I Street, NW, Suite 400
Washington, DC 20005

National Cellular Safetalk Center, Inc.
c/o John Cusack
385 Airport Road, Suite A
Elgin, IL 60123

Nextel Communications, Inc.
c/o Robert S. Foosaner/Lawrence R. Krevor
800 Connecticut Avenue, NW, Suite 1001
Washington, DC 20006

National Emergency Number Association
c/o Roy D. Meredith
PO Box 429
High Point, NC 27261-0429

Northern Telecom Inc.
c/o Stephen L. Goodman
Halprin, Temple & Goodman
1100 New York Avenue, NW, Suite 650 East
Washington, DC 20005

NYNEX Companies
c/o Edward R. Wholl/Jacqueline E. Holmes
Nethersole
120 Bloomingdale Road
White Plains, NY 10605

OPASTCO
c/o Lisa M. Zaina
21 Dupont Circle, NW, Suite 700
Washington, DC 20036

Oregon State Police Emergency Management
Division
c/o David C. Yandell
595 Cottage Street, NE
Salem, OR 97310

Personal Communications Industry Association
(PCIA)
c/o Mark J. Golden
1019 19th Street, NW, Suite 1100
Washington, DC 20036

Pro-West & Associates
c/o Philip G. Sailer
PO Box 812
Walker, MN 56484

Redcom Laboratories Inc.
c/o Jerome S. Caplan
One Redcom Center
Victor, NY 14564-0995

Siemens Rolm Communications Inc.
c/o Scott E. Wollaston
PO Box 58075
Santa Clara, CA 95052-8075

911 Association of Central Oklahoma
Governments
c/o Zach D. Taylor
Six Broadway Executive Park
6600 North Harvey Place, Suite 200
Oklahoma City, OK 73116-7913

Orbital Communications Corporation
c/o Albert Halprin
Halprin, Temple & Goodman
1100 New York Avenue, NW, Suite 650 East
Washington, DC 20005

Pacific Bell, Nevada Bell and Pacific Bell Mobile
Services
c/o James P. Tuthill/Betsy Stover Granger
140 New Montgomery Street, Room 1525
San Francisco, CA 94105

Pertech America, Inc.
c/o Michael J. Celeski
One Illinois Center
111 East Wacker Drive, Suite 500
Chicago, IL 60601

Proctor
c/o O.C. Lee
15050 Northeast 36th
Redmond, WA 98052-5317

Rural Cellular Association
c/o David L. Jones
2120 L Street, NW, Suite 520
Washington, DC 20037

Southwestern Bell Mobile Systems, Inc.
c/o Bruce E. Beard
17330 Preston Road, Suite 100A
Dallas, TX 75252

Forest A. Southwick
107 Bent Twig Road
Easley, SC 29642-9523

Springwich Cellular Limited Partnership
c/o Jean L. Kiddoo/Shelley L. Spencer
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Stanford Telecommunications, Inc.
c/o Herman A. Bustamante
121 Crossman Avenue
Sunnyvale, CA 94089-1117

Stanford Telecommunications, Inc.
c/o Leonard Schuchman
1761 Business Center Drive
Reston, VA 22090

Starsys Global Positioning, Inc.
c/o Raul R. Rodriguez/Stephen D. Baruch
Leventhal, Senter & Lerman
2000 K Street, NW, Suite 600
Washington, DC 20006

Tele-Communications Association
c/o R. Michael Senkowski/Jeffrey S.
Linder/Ilene T. Weinrich
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

Telecommunications for the Deaf, Inc.
c/o Alfred Sonnenstrahl
8719 Colesville Road, Suite 300
Silver Spring, MD 20910

Telecommunications Industry Association
c/o Dan Bart
2500 Wilson Boulevard, Suite 300
Arlington, VA 22201

Telident, Inc.
c/o Michael J. Miller
4510 West 77th Street, Suite 101
Minneapolis, MN 55435

Carter County Emergency Communications
District
c/o Russell A. Hopkins
PO Box 999
Elizabethton, TN 37643

Greene County Emergency Communications
District
c/o Pete Luttrell
111 Union Street
Greeneville, TN 37743

Terrapin Corporation
c/o David Kelley
11958 Monarch Street
Garden Grove, CA 92641

Texas Advisory Commission on State
Emergency Communications
c/o Dan Morales
PO Box 12548, Capitol Station
Austin, TX 78711-2548

Greater Harris County 9-1-1 Emergency
Network
c/o Laverne Hogan
602 Sawyer, Suite 710
Houston, TX 77007

National Emergency Number Association —
Texas Chapter
c/o J. Ross Sherohman
PO Box 632911
Nacogdoches, TX 75963-2911

US West, Inc.
c/o Jeffrey S. Bork
1020 19th Street, NW, Suite 700
Washington, DC 20036

United States Coast Guard
c/o J.D. Hersey, Jr.
2100 2nd Street, SW
Washington, DC 20593

Anacortes Police Department
c/o Michael L. King
1011 12th Street
Anacortes, WA 98221

Department of Community, Trade and
Economic Development
c/o Robert G. Oenning
PO Box 48346
Olympia, WA 98504-8346

King County Police Communications
c/o Captain John W. Beard
516 Third Avenue
Seattle, WA 98104-2312

San Juan County
c/o David L. Zeretzke
350 Court Street, #5
Friday Harbor, WA 98250

TRW, Inc.
c/o Norman P. Leventhal/Daid S. Keir
Leventhal, Senter & Lerman
2000 K Street, NW, Suite 600
Washington, DC 20006

United States Cellular Corporation
c/o Peter M. Connolly
Koteen & Naftalin
1150 Connecticut Avenue, NW
Washington, DC 20036

UTC
c/o Jeffrey L. Sheldon/Thomas E. Goode
1140 Connecticut Avenue, NW, Suite 1140
Washington, DC 20036

Cowlitz County Technical Services Center
c/o Richard L. Bullock
312 SW First Avenue
Kelso, WA 98626-1724

King County E911 Program Office
c/o Marlys R. Davis
700 Fifth Avenue, Suite 2300
Seattle, WA 98104-5002

Peninsula Communications
Port Angeles Police Department
c/o Naomi L. Wu
321 East 5th Street
Port Angeles, WA 98362

Thurston County Department of
Communications
c/o James C. Quackenbush
2000 Lakeridge Drive, SW
Olympia, WA 98502

Washington Tracer
Oregon Tracer
c/o Arthur A. Butler/Sara Siegler-Miller
Ater, Wynne, Hewitt, Dodson & Skerritt
601 Union Street, Suite 5450
Seattle, WA 98101-2327

Westinghouse Electric Corporation
Electronic Systems Group
c/o James Carlsen
PO Box 756 — MS A475
Baltimore, MD 21203

Ad Hoc Rural Cellular Coalition
c/o Michael R. Bennet
Bennet & Bennet, PLLC
1831 Ontario Place, NW
Suite 200
Washington, DC 20009

Dennis C. Brown
Brown & Schwaninger
1835 K Street, NW
Suite 650
Washington, DC 20006

Waterway Communications Systems, Inc.
c/o Martin W. Bercovici
Keller and Heckman
1001 G Street, NW, Suite 500W
Washington, DC 20001-4545

Ad Hoc Alliance for Public Access to 911
c/o Samuel A. Simon
901 15th Street, NW
Suite 230
Washington, DC 20005

John Prendergast
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, NW
Suite 300
Washington, DC 20554

Alejandro A. Calderón
President
Concepts to Operations, Inc.
801 Compass Way, Suite 217
Annapolis, MD 21401


Tammi A. Foxwell

*Via hand delivery.